

**FILED**

May 03 2022

Mark B. Busby  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

**CRIMINAL COVER SHEET**

***Instructions:*** Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. Najee Izell Ard

CASE NUMBER: 3:22-cr-00183 CRB

CR

Is This Case Under Seal?

Yes

No ☒

Total Number of Defendants:

1 ☒

2-7

8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No ☒

Venue (Per Crim. L.R. 18-1):

SF ☒

OAK

SJ

Is this a potential high-cost case?

Yes

No ☒

Is any defendant charged with a death-penalty-eligible crime?

Yes

No ☒

Is this a RICO Act gang case?

Yes

No ☒

Assigned AUSA

(Lead Attorney): Alethea M. Sargent

Date Submitted: 4/28/2022

Comments:

Associated with Case No. 3:21-mj-71060 MAG

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**

May 03 2022

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

UNITED STATES OF AMERICA,

V.

NAJEE IZELL ARD

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 922(g)(1) - Felon in Possession of Ammunition  
18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 3rd day of

May, 2022.

*Karen L. Horn*

Clerk

Bail, \$ No Process

*Joseph C. Spero*  
Joseph C. Spero, Chief Magistrate Judge

**FILED**

May 03 2022

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 3:22-cr-00183 CRB
	)	
Plaintiff,	)	<u>VIOLATION:</u>
	)	18 U.S.C. § 922(g)(1) – Felon in Possession of
v.	)	Ammunition;
	)	18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –
NAJEE IZELL ARD,	)	Forfeiture Allegation
	)	
Defendant.	)	

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 922(g)(1) – Felon in Possession of Ammunition)

On or about April 29, 2021, in the Northern District of California, the defendant,  
NAJEE IZELL ARD,  
knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding  
one year, knowingly possessed ammunition, namely, six rounds of .40 caliber Winchester brand  
ammunition, and the ammunition was in and affecting interstate commerce, all in violation of Title 18,  
United States Code, Section 922(g)(1).

INDICTMENT

1 FORFEITURE ALLEGATION: (18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

2 The allegations contained in the sole count of this Indictment are re-alleged and incorporated by  
3 reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)  
4 and Title 28, United States Code, Section 2461(c).

5 Upon conviction of the offense set forth in this Indictment, the defendant,  
6 NAJEE IZELL ARD,  
7 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28,  
8 United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the  
9 offense, including, but not limited to, the following property:

10 a. six .40 caliber Winchester brand ammunition casings.

11 If any of the property described above, as a result of any act or omission of the defendant:

- 12 a. cannot be located upon exercise of due diligence;  
13 b. has been transferred or sold to, or deposited with, a third party;  
14 c. has been placed beyond the jurisdiction of the court;  
15 d. has been substantially diminished in value; or  
16 e. has been commingled with other property which cannot be divided without  
17 difficulty,

18 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,  
19 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

1 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,  
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

3  
4 DATED: May 3, 2022

A TRUE BILL.

5  
6 /s/ Grand Jury Foreperson

FOREPERSON

San Francisco, California

7  
8 STEPHANIE M. HINDS  
9 United States Attorney

10 /s/ Alethea M. Sargent

11 ALETHEA M. SARGENT

12 Assistant United States Attorney  
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**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**

18 U.S.C. § 922(g)(1) - Felon in Possession of Ammunition

- ☐
- Petty
- 
- ☐
- Minor
- 
- ☐
- Misdemeanor
- 
- ☒
- Felony

 PENALTY: Maximum 10 years imprisonment  
 Maximum \$250,000 fine  
 Maximum 3 years supervised release  
 \$100 special assessment  
 Forfeiture

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION
**DEFENDANT - U.S.**

▶ Najee Izell Ard

 DISTRICT COURT NUMBER  
 3:22-cr-00183 CRB
**DEFENDANT****IS NOT IN CUSTODY**
 1) ☐ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons was served on above charges ▶
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

On pretrial release for 3:21-mj-71060 (NDCA)

**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes  
 been filed? ☐ No

 If "Yes"  
 give date  
 filed

**DATE OF  
ARREST** ▶

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY** ▶

Month/Day/Year

☒ U.S. Attorney ☐ Other U.S. Agency

Name and Office of Person

Furnishing Information on this form Stephanie M. Hinds

 Name of Assistant U.S.  
 Attorney (if assigned)

Alethea M. Sargent

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS\* ☐ WARRANT

Bail Amount: \_\_\_\_\_

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 \* Where defendant previously apprehended on complaint, no new summons or  
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: